

DENNIS M. CAMPOS, SBN 050234  
GOLDSBERRY, FREEMAN & GUZMAN, LLP  
777 12<sup>th</sup> Street, Suite 250  
Sacramento, CA 95814  
Telephone: (916) 448-0448

Attorneys for Creditor  
GLENN GROWERS

IN THE UNITED STATES BANKRUPTCY COURT  
FOR EASTERN DISTRICT OF CALIFORNIA (SACRAMENTO)

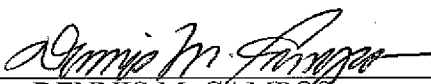
In re	)	Chapter 7
	)	Case No. 09-33765-A-7
California Storage Construction, Inc.,	)	DC No. DMC-1
	)	
Debtor.	)	<b>MOTION FOR RELIEF FROM</b>
	)	<b>AUTOMATIC STAY</b>
	)	
	)	<b>Date: 10/26/09</b>
	)	<b>Time: 9:00 a.m.</b>
	)	<b>Dept: 7<sup>th</sup> Floor, Ctrm 28</b>
	)	<b>Judge: Hon. Michael J. McManus</b>

Pursuant to United States Bankruptcy Court, Eastern District of California, Local Rules of Practice, Rule 9014-1, Creditor and moving party GLENN GROWERS moves the Court to grant relief from the Automatic Stay Order issued in this matter pursuant to the provisions of 11 U.S.C. § 362(d). GLENN GROWERS has a lawsuit pending in Glenn County Superior Court against a number of defendants, including CALIFORNIA STORAGE CONSTRUCTION, INC. The matter involves construction of three large grain bin silos which have sunk and tilted. Damages are in excess of Two Million Dollars (\$2,000,000.00)

It is respectfully requested that this Court lift the Automatic Stay to allow GLENN GROWERS to proceed in the Glenn County action to sever CALIFORNIA STORAGE CONSTRUCTION, INC. from the other parties, and that GLENN GROWERS be allowed to proceed in the lawsuit with the other parties.

Dated: September 15, 2009

GOLDSBERRY, FREEMAN & GUZMAN, LLP

By:   
DENNIS M. CAMPOS  
Attorneys for Creditor  
GLENN GROWERS